<u>REMARKS</u>

I.   <u>Introduction</u>

In response to the Office Action dated November 5, 2004, claims 11, 23, and 35 have been amended. Claims 1-10, 13-22, 25-34, 38-40, 42-44, and 46-48 have been withdrawn from consideration and claims 11-12, 23-24, 35-37, 41, 45, and 49 are currently pending. Re-examination and re-consideration of the application, as amended, is requested.

II.   <u>Prior Art Rejections</u>

On page (2) of the Office Action, claims 11-12, 23-24, 35-37, 41, 45, and 49 were rejected under 35 U.S.C. §103(a) as being unpatentable over Berstis, U.S. Patent No. 6,182,010 (Berstis).

Specifically, the independent claims were rejected as follows:

> Regarding claim 11, Berstis teaches a system for accessing geographic information comprising:
> (a) a personal digital assistant (figure 1);
> (b) an application on the personal digital assistant, the application configured to
>   (i) request map data from a server (figure 3; col. 4, line 57 to col. 5, line 2);
>   (ii) receive the map data in a file constructed prior to the server receiving the request (col. 7, lines 13-20);
>   (iii) format the map data (col. 2, lines 20-25);
>   (iv) display the map data on a screen of the personal digital assistant (col. 2, lines 52-60).

> Claims 23-24 have similar limitations as claims 11-12, therefore are rejected under the same rationale.

> Claims 35-37 have similar limitations as claims 11-12, therefore are rejected under the same rationale.

> Claims 41,45 and 49 have similar limitations as claim 11, therefore are rejected under the same rationale.

Independent Claims 11, 23, and 35

Applicants traverse the above rejections. Specifically, Berstis does not teach, disclose or suggest a PDA receiving a mapset containing data for multiple maps, wherein the mapset was constructed prior to the PDA requesting the data.

Independent claims 11, 23, and 35 are directed towards a PDA used to access geographic information. More specifically, an application on a PDA requests map data from a servlet. The map data is then received by the PDA in the form of a mapset. The amended claims specifically provide that the mapset contains map data for 2 or more maps. Further, the claims also specifically provide

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that the mapset was constructed prior to the servlet receiving the request from the PDA. Once the mapset is received, the PDA formats and displays the mapdata from the mapset on a screen of the PDA.

Applicants note that the amended claims provide that the mapset (which consists of two or more maps) is constructed prior to receiving the request for map data from the PDA. The rejection address the prior construction element of the claims relying on col. 7, lines 13-20 which provides:

> In a preferred embodiment, graphical image 92 is stored in a local mass storage device such as mass storage device 54. Preferably, mass storage device 54 is a DVD ROM device. Disks can be stored which provide the images for an entire region. Local storage of the images provides for rapid retrieval and display. An alternative is to store the images in a server system provided by server 40 (as in FIG. 3). This approach provides nearly limitless storage, but it may have lower image access rates depending on the transfer rate of the wireless data link.

As can be seen from the above text (and the remainder of Berstis), there is no description or suggestion, implicit or explicit, regarding when a mapset is constructed. Instead, the text merely provides that images may be stored in a server system. However, the fact that a mapset comprised of data for multiple maps is constructed prior to even receiving a request for such map data from a PDA is unique and novel to the present invention. As stated in the background page 8, lines 14-16:

> When vector or raster-based data are needed, the information is typically created and downloaded upon request. Consequently, each time a map is requested, delays from obtaining and transmitting the requested map result.

The present claims clearly provide an advantage over the prior art in that the file is constructed prior to receiving a request. Accordingly, there is no delay for obtaining the map result to transmit to the client. Berstis fails to teach such a mapset construction. Instead, Berstis would fall within the prior art wherein the user experiences a delay while the data for the mapset is obtained.

In view of the above, Applicants submit that independent claims 11, 23, and 35 are allowable over the prior art. Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Berstis. In addition, Applicants' invention solves problems not recognized by Berstis.

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Independent Claims 41, 45, and 49

Applicants traverse the above rejections. Specifically, Berstis fails to even remotely describe constructing a mapset in a parallel on multiple CPUs.

Independent claims 41, 45, and 49 are generally directed towards a PDA used to access geographic information. In fact, the claim elements are very similar between claims 11, 23, and 35 and 41, 45, and 49. However, the distinguishing limitation in claims 41, 45, and 49 provides that the map set is constructed in parallel on multiple processing units.

In rejecting these claims, the Office Action merely says these claims have similar limitations to that of claim 11. However, the parallel constructing and multiple processing units are not similar limitations to claim 11. Further, none of the cited references even remotely suggest or allude to such claim limitations.

Under MPEP §2142 and 2143.03 "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." The rejection merely ignores the parallel processing and multiple CPU limitations. Such explicit claim language cannot merely be ignored.

For at least the above reasons, Applicants submit claims 41, 45, and 49 are allowable over the cited art.

III. Conclusion

Applicants submit that independent claims 11, 23, 35, 41, 45, and 49 are allowable over Berstis. Further, dependent claims 12, 24, and 36-37 are submitted to be allowable over Berstis in the same manner, because they are dependent on independent claims 11, 23, 35, 41, 45, and 49, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 12, 24, and 36-37 recite additional novel elements not shown by Berstis.
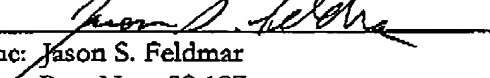
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In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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